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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 13-0318 RS
14 Plaintiff,)
15 v.)
16 JAIME VICENTE CABALLERO,)
17 Defendant.)
18 _____)

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME UNDER 18
U.S.C. § 3161**

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20 On May 28, 2013, the parties in this case appeared before the Court. At that time, the
21 Court set the matter to June 25, 2013. The parties have agreed to exclude the period of time
22 between May 28, 2013 and June 25, 2013 from any time limits applicable under 18 U.S.C.
23 § 3161. The parties represented that granting the exclusion would allow the reasonable time
24 necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
25 also agree that the ends of justice served by granting such an exclusion of time outweigh the best
26 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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STIPULATION & [PROPOSED] ORDER EXCLUDING TIME
CR 13-0318 RS

1 At the hearing, the Court made findings consistent with this agreement. SO STIPULATED:

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6 DATED: May 28, 2013

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9 DATED: May 28, 2013

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United States Attorney

/s/
JANAKI GANDHI
Special Assistant United States Attorney

/s/
JODI LINKER
Attorney for Defendant Jaime Vicente Caballero

[PROPOSED] ORDER

For the reasons stated above and at the May 28, 2013 hearing, the Court finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from May 28, 2013 and June 25, 2013 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Denying the requested exclusion of time would deprive the parties of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 5/29/13

THE HONORABLE RICHARD SEEBORG
United States District Judge